

**INFORMATIVE MOTION OF THE FEE EXAMINER PURSUANT TO ORDER
REGARDING PROCEDURES FOR ATTENDANCE, PARTICIPATION, AND
OBSERVATION OF DECEMBER 11-12, 2019 OMNIBUS HEARING**

1. On December 4, 2019, the Fee Examiner filed the *Fee Examiner’s Supplemental Report on Uncontested Interim and Final Fee Applications Recommended for Court Approval* [Dkt. No. 9428] (the “**Supplemental Report**”).

¹ The Debtors in these Title III Cases, along with each Debtor's respective Title III case number and the last four (4) digits of each Debtor's federal tax identification number, as applicable, are the: (i) Commonwealth of Puerto Rico (Bankruptcy Case No. 17 BK 3283-LTS) (Last Four Digits of Federal Tax ID: 3481); (ii) Puerto Rico Sales Tax Financing Corporation ("COFINA") (Bankruptcy Case No. 17 BK 3284-LTS) (Last Four Digits of Federal Tax ID: 8474); (iii) Puerto Rico Highways and Transportation Authority ("HTA") (Bankruptcy Case No. 17 BK 3567-LTS) (Last Four Digits of Federal Tax ID: 3808); (iv) Employees Retirement System of the Government of the Commonwealth of Puerto Rico ("ERS") (Bankruptcy Case No. 17 BK 3566-LTS) (Last Four Digits of Federal Tax ID: 9686); and, (v) Puerto Rico Electric Power Authority ("PREPA") (Bankruptcy Case No. 17 BK 4780-LTS) (Last Four Digits of Federal Tax ID: 3747) Puerto Rico Public Buildings Authority ("PBA") (Bankruptcy Case No. 19-BK-5523-LTS) (Last Four Digits of Federal Tax ID: 3801) (Title III case numbers are listed as Bankruptcy Case numbers due to software limitations).

2. The Fee Examiner remains in productive discussions regarding several deferred fee applications for the fifth interim fee period (October 1, 2018 through January 31, 2019) and sixth interim fee period (February 1, 2019 through May 31, 2019). The Fee Examiner expects to submit a supplemental report, Certificate of No Objection, and proposed order for their approval—with adjustments—before year-end.

3. The Fee Examiner's review of applications covering the Seventh Interim Fee Period (June 1, 2019 to September 30, 2019) is underway, with reporting and recommendations expected in connection with the March 4, 2020 omnibus hearing. On December 4, 2019, Cobra Acquisitions LLC ("**Cobra**") filed the *Omnibus Objection to Fee Applications Filed by Professionals and Request to Increase Holdback Amount* [Dkt. No. 9419], noticing the matter for hearing on March 4, 2019. The Cobra objection addresses, generically, fees and expenses incurred on behalf of PREPA beginning with the Seventh Interim Fee Period. The Fee Examiner will address Cobra's objection, to the extent appropriate, in the summary report to be filed no later than February 26, 2020 in anticipation of the March 4, 2020 omnibus hearing.

4. On November 20, 2019, the Fee Examiner filed the *Fourth Interim and Consolidated Semiannual Application of the Fee Examiner and Godfrey & Kahn, S.C., Counsel to the Fee Examiner, for Allowance of Compensation for Services Rendered and Reimbursement of Expenses for the Period From April 1, 2019 Through September 30, 2019* [Dkt. No. 9262] (the "**Fourth Fee Application**"), noticed for hearing on December 11, 2019.

5. On December 3, 2019, the Fee Examiner filed the *Fee Examiner's Responsive Memorandum in Opposition to Duff & Phelps, LLC's Motion for Partial Summary Judgment* [Dkt. No. 9399], the *Declaration of Leah Viola in Support of Fee Examiner's Response to Duff & Phelps LLC's Motion for Partial Summary Judgment* [Dkt. No. 9404], and the *Fee Examiner's*

Response to Duff & Phelps, LLC's Statement of Material Facts in Support of Motion for Partial Summary Judgment Under Fed. R. Bankr. P. 7056(A) [Dkt. No. 9408] (collectively, the “**Summary Judgment Response**”). Pursuant to the *Order Setting Briefing Schedule for Duff & Phelps's Motion for Summary Judgment* [Dkt. No. 9350], reply briefs are due on December 10, and the Court has stated it will thereafter take the matter on submission. The underlying fee application [Dkt. No. 8450] and the Fee Examiner's objection [Dkt. No. 8862] remain scheduled for hearing on January 30, 2020. *See Order Regarding Joint Status Report by Fee Examiner and Duff & Phelps LLC in Response to Order Dated October 25, 2019* [Dkt. No. 9170].

6. The Fee Examiner's counsel, Katherine Stadler of Godfrey & Kahn, S.C. and Eyck Lugo of Edge Legal Strategies, PSC, will appear in person to respond to any questions or instructions regarding the Supplemental Report, the Fourth Fee Application, the Duff & Phelps issues, and any matters raised by the Court or by any party in connection with professional fees—all in Courtroom 3 of the United States District Court for the District of Puerto Rico, 150 Carlos Chardón Street, Federal Building, San Juan, Puerto Rico 00918-1767. No additional persons representing the Fee Examiner will appear at the hearing, nor does the Fee Examiner plan to attend in person. The Fee Examiner has requested permission to participate in the hearing by telephone.

Dated this 5th day of December, 2019.

WE HEREBY CERTIFY that on this date, we electronically filed the foregoing motion with the Clerk of the Court using the CM/ECF system that will send notification of such filing to all attorneys of record registered in the use of the CM/ECF system.

EDGE Legal Strategies, PSC

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